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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

| | | |
|--------------------------------------|---|---|
| ALAN BRAHAMSHA, individually and for | : | Civil Action No. 3:16-cv-5637 (FLW/LHG) |
| all others similarly situated, | : | |
| | : | |
| Plaintiff, | : | APPLICATION FOR LOCAL CIVIL |
| | : | RULE 6.1(b) ORDER EXTENDING |
| v. | : | TIME TO RESPOND TO COMPLAINT |
| | : | |
| REDBOX AUTOMATED RETAIL, LLC, a | : | |
| Delaware limited liability company, | : | |
| | : | |
| Defendant. | : | |
| | : | |

Defendant Redbox Automated Retail, LLC (“Redbox”), by and through its undersigned counsel, hereby requests entry of an Order extending Defendant’s time to respond to Plaintiffs’ Complaint, and in support says as follows:

1. Plaintiff filed his Complaint in the Superior Court of New Jersey, Monmouth County, Law Division, on July 28, 2016.
2. On August 17, 2016, Plaintiff served the Complaint on Defendant.
3. Defendant removed this action to this Court on September 16, 2016. (DE 1.)
4. Pursuant to Fed. R. Civ. Pro. 81(c)(2)(c), Defendant’s response to Plaintiff’s Complaint is due on September 23, 2016.

5. Pursuant to Local Civil Rule 6.1(b), Defendant hereby requests entry of this Order extending Defendant's time to file a response to Plaintiff's Complaint, through and until October 7, 2016.

BUCHANAN INGERSOLL & ROONEY PC
Attorneys for Defendant Redbox Automated Retail, LLC

s/Christopher J. Dalton
Christopher J. Dalton

Dated: September 16, 2016

IT IS ORDERED that Defendant's time to file a response to Plaintiff's Complaint, is hereby extended through and until **October 7, 2016**.

Dated: _____

CERTIFICATE OF SERVICE

On this date, I caused a copy of the foregoing Application for Local Rule 6.1(b) Order to be served via the Court's CM/ECF system upon all counsel entitled to receive notices of electronic filing in this action.

BUCHANAN INGERSOLL & ROONEY PC
Attorneys for Defendant Redbox Automated Retail, LLC

s/Christopher J. Dalton
Christopher J. Dalton

September 16, 2016